

**MICHIGAN DEPARTMENT OF EDUCATION
SUMMARY OF PUBLIC HEARINGS ON THE MICHIGAN SCHOOL ACCREDITATION AND
ACCOUNTABILITY SYSTEM (MI-SAAS)
APRIL, 2011**

Summary of Attendance at MI-SAAS Public Hearings

Notice of public hearings regarding the proposed Michigan School Accreditation and Accountability System (MI-SAAS) was published in three newspapers on April 6, 2011: the Lansing State Journal, the Pontiac Oakland Press, and the Marquette Mining Journal . In addition, notice of the hearings was sent via email in the Michigan Department of Education (MDE) weekly communication to local educators, as well as to other MDE listservs.

A total of twelve public hearings was held on April 20 and 21, 2011 in four locations around the state, as noted in the table below. Written comments could also be submitted via mail, email, or facsimile.

Location	Session Details		
	20-Apr-11	21-Apr-11	21-Apr-11
Kent ISD (Grand Rapids, MI)	4:30-7:30 pm	9:00-11:00 am	3:00-5:00 pm
Washtenaw ISD (Ann Arbor, MI)	4:00-7:00 pm	9:00-11:00 am	3:00-5:00 pm
Inland Lakes High School (Indian River, MI)	4:00-7:00 pm	10:00 am-noon	3:00-5:00 pm
Northern Michigan University (Marquette, MI)	4:00-7:00 pm	9:00-11:00 am	3:00-5:00 pm
Written (mail, email, fax) submissions	<i>from 3:30 pm 31-Mar-11 to 5:00 pm 21-Apr-11</i>		

Participation in each session is summarized in the table below.

Location	Number Attending		
	Speaking	Listening	Total
Kent ISD (Grand Rapids, MI)	6*	10*	16
Washtenaw ISD (Ann Arbor, MI)	3*	5	8
Inland Lakes High School (Indian River, MI)	4	1	5
Northern Michigan University (Marquette, MI)	3	0	3
Written (mail, email, fax) submissions	8**	0	8
Total	24	16	40

*One individual attended all three hearings in Kent ISD, and another individual attended all three in Washtenaw, on behalf of Macomb ISD, testifying twice and listening once. The totals reflect only one testimony.

**Two written testimonies were received that were also given orally at one or more hearings. The totals reflect six new testimonies and two repeat testimonies from oral hearings.

Summary of Comments Received at MI-SAAS Public Hearings

The following is a summary of the comments received during the public hearing process, as well as preliminary MDE staff responses to these comments.

COMMENT #1

High-performing schools are penalized by the inclusion of improvement in the ranking system.

RESPONSE TO COMMENT #1

This occurs in two circumstances: students at the highest performance levels in grade 3-7 reading and mathematics and schools with very high average scores have little room for improvement. Consideration may be given to using a "ceiling clause." This would mean that schools where performance is higher than a determined threshold would be ranked based only on proficiency and achievement gap and improvement would be removed from the metric. Consideration may also be given, in the Performance Level Change metric, to give credit as "improving" for students who are in the "maintaining" category if they were previously in the "top" category of performance.

COMMENT #2

Schools should have access to the databases necessary to replicate the findings.

RESPONSE TO COMMENT #2

Providing access is in keeping with current MDE practices. For the original Persistently Lowest Achieving list, MDE provided the full data base, as well as a tool for schools to look up their results. MDE consistently makes data files available and plans to continue to do so.

COMMENT #3

The PLA list should be removed as a qualifying factor for being labeled "unaccredited."

RESPONSE TO COMMENT #3

Consideration will be given to eliminating the tie between appearance on the PLA list and accreditation status.

COMMENT #4

Concerns were expressed regarding the use of subgroup achievement gaps, including n-size of subgroups, stability of estimates, reporting (but not using) subgroup achievement gaps, and the use of AYP subgroups possibly creating an unlevel playing field for differing schools.

RESPONSE TO COMMENT #4

The original conceptualization of how to include a subgroup achievement gap was to use each of the AYP subgroups, find the largest gap among those in the subgroup and everyone else (non-subgroup), and include the size of that particular gap in a school's ranking. A number of negative reactions to this conceptualization were received from participants in the public hearings, as well as from the MDE technical advisory committee, national experts, and other stakeholders. Consideration will be given to

removing AYP subgroups and instead using the achievement gap between the top 30% and the bottom 30% of the students

COMMENT #5

In order to be ranked using MEAP scores, adjustments need to be made for grade-specific differences. Across grade differences in percent proficient can drive the school's ranking based on grade configuration more than on actual performance.

RESPONSE TO COMMENT #5

Consideration will be given to converting all student scale scores into z-scores that compare each student's score to other students in his/her grade, subject, test type and year. This would standardize out grade-level differences and test type differences in score and proficiency levels.

COMMENT #6

School self-report indicators should be included with a yes/no status and should not be graded or scored.

RESPONSE TO COMMENT #6

Consideration will be given to having schools receive full credit for accreditation for undertaking the self-assessment process and submitting the rubrics without scoring them.

COMMENT #7

Suggest the inclusion of context data for the ISD and state.

RESPONSE TO COMMENT #7

The accreditation dashboard is already planned to include and report out school, district, ISD and state aggregates.

COMMENT #8

Will schools have access to the databases used to determine their accreditation? If one of the design goals is to implement a system that is more transparent, shouldn't this be required? Data is "only accessible by certain individuals at the department."

RESPONSE TO COMMENT #8

MDE always intended to provide schools with access to the school-level data required to replicate the analyses. Schools will also have access to their own student-level data from which the school-level aggregates were created. Because of FERPA protections, schools and districts will only have access to

student-level data for their own schools. The complete school-level data file, along with the ranking, will be published.

COMMENT #9

MDE should hold schools accountable and not bend to pressure from school officials who don't want transparency; should keep the system rigorous and straightforward.

RESPONSE TO COMMENT #9

MDE concurs .

COMMENT #10

Center-based programs may need special provisions.

RESPONSE TO COMMENT #10

Special provisions have been made for both center-based and alternative education programs through implementation of shared educational entities (SEEs) in the 2010-2011 school year to allow these programs to have accountability applied in a different manner. Based on feedback regarding the policy and its implementation, substantial data system modifications for the 2011-2012 school year have been planned to facilitate reporting of students in these SEEs. The SEEs help ensure that center-based or alternative education programs serving students from multiple districts do not take an accountability "hit" because they are serving students from other districts and who may have distinct sets of learning challenges.

In addition, the creation of z-scores (addressed above) for all students against the appropriate grade, subject, and test type provides center based programs with special provisions. Students in center-based programs taking MI-Access would only be compared to other students tested on MI-Access.

COMMENT #11

The additional factors are reasonable, are good elements to hold schools accountable for, and are things within the school's control. They are appropriate and do a good job of capturing many of the standards of accreditation in statute.

RESPONSE TO COMMENT #11

So noted.

COMMENT #12

It is appropriate that MI-SAAS does not assign letter grades.

RESPONSE TO COMMENT #12

So noted.

COMMENT #13

Including credit for the School Improvement Plan is positive and helpful, and is best included as currently proposed (i.e. credit for completion and self-study).

RESPONSE TO COMMENT #13

So noted.

COMMENT #14

The removal of AYP was a positive change.

RESPONSE TO COMMENT #14

So noted.

COMMENT #15

Dashboard style of reporting is helpful and positive.

RESPONSE TO COMMENT #15

So noted.

COMMENT #16

The inclusion of context information is a strong point, and helps provide a more complete picture.

RESPONSE TO COMMENT #16

So noted.

COMMENT #17

It is appropriate that certain factors, such as number of advanced placement (AP) courses offered, is available for reporting in the optional Points of Pride section and is not part of the high-stakes accountability.

RESPONSE TO COMMENT #17

So noted.

COMMENT #18

The use of multiple years of data is good, although one respondent cautioned “MI-SAAS should strive to achieve balance between stability and sensitivity that favors stability.”

RESPONSE TO COMMENT #18

Efforts have been made to achieve balance between stability and sensitivity to changes.

COMMENT #19

Inclusion of graduation rate and improvement of graduation rate in the statewide top-to-bottom ranking strengthens the MI-SAAS system and its ability to account for student growth.

RESPONSE TO COMMENT #19

So noted.

COMMENT #20

The addition of a sunset clause partially addresses the issue of having an accountability system that will always have at least 5% of schools unaccredited.

RESPONSE TO COMMENT #20

So noted.

COMMENT #21

Using z-scores on student scale scores is a good and fair suggestion.

RESPONSE TO COMMENT #21

So noted.

COMMENT #22

Concern was expressed over continual change in both the accreditation system and education policy/school reform overall.

RESPONSE TO COMMENT #22

While the current accreditation system, Education YES! has been in place since 2002, MI-SAAS has been revised to reflect comments from the field; refine its rigor, validity, and fairness; and respond to legislative and policy initiatives.

COMMENT #23

The label of unaccredited creates a stigma for students in schools, and may have negative impacts on students in those schools.

RESPONSE TO COMMENT #23

Evaluation of whether schools are adequately serving their students through accreditation is a requirement of the law and provides local communities with useful information regarding whether that purpose is being met by local schools. If a school is unaccredited, parents, students, and communities are informed that school performance is problematic and can work with the school to understand why it is unaccredited and to help make improvements. With regard to universities not accepting students from unaccredited schools, universities already rate high schools and adjust the judgment of student applicants based on those ratings.

COMMENT #24

The department should start over in designing an accreditation system using a referent group.

RESPONSE TO COMMENT #24

This comment makes a false assumption that the department did not consult a referent group in designing the system. In fact, MDE has been designing and revising MI-SAAS since 2008. These efforts have included:

- 1. An original referent group that included a wide range of stakeholders.*
- 2. Repeated interactions with the Office of Educational Assessment & Accountability Technical Advisory Committee.*
- 3. Three rounds of public hearings, all yielding modifications.*
- 4. Multiple statewide surveys requesting feedback.*
- 5. At least 30 presentations to various groups (e.g., Middle Cities Education Association, School Improvement Conference, School Improvement Facilitators Network, Regional Data Initiatives, statewide informational webinar, presentations to individual districts and ISDs).*
- 6. A referent group in 2010 specifically regarding the top-to-bottom ranking.*
- 7. Continual ongoing contact with the field through emails, phone calls, and personal contact.*

The number of changes made to the original proposed system demonstrates the extent to which MDE has listened and responded to comments from the field and national experts.

COMMENT #25

The department should base the accreditation system on the standards as outlined in statute.

RESPONSE TO COMMENT #25

This comment makes a false assumption that the system as proposed does not address the standards as outlined in statute. The Michigan Compiled Laws (MCL) 380.1280 (2) indicate the following:

"accredited" means certified by the superintendent of public instruction as having met or exceeded standards established under this section for 6 areas of school operation: administration and school organization, curricula, staff, school plant and facilities, school and community relations, and school improvement plans and student performance.

In addition, MCL 380.1280 (5) indicates the following:

(5) The standards for accreditation or summary accreditation under this section shall include as criteria pupil performance on Michigan education assessment program (MEAP) tests and on the Michigan merit examination...but shall not be based solely on pupil performance on MEAP tests or the Michigan merit examination.... The standards shall also include as criteria multiple year change in pupil performance on MEAP tests and the Michigan merit examination....

Each of the six areas of school operation identified in MCL 380.1280 (2) is covered by MI-SAAS standards as currently proposed. See the chart on following page for how the six areas of school operation relate to proposed standards and criteria.

Table 1: How Areas of School Operation Named In Statute Related to Proposed Standards and Criteria

Area of School Operation	Standard	Criteria
Administration and school organization	*The school identifies, plans and addresses critical elements related to administration and school organization, and provides data regarding their plan and progress.	*Annual Performance Indicators *School Improvement Plan published (MCL 380.1280b)
Curricula	*The school identifies, plans and addresses critical elements related to curriculum, and provides data regarding their plan and progress. *MCL 380.1204a (required curricula offered)	*Annual Performance Indicators *Assurances in the School Improvement Plan
Staff	*The school identifies, plans and addresses critical elements related to staff, and provides data regarding their plan and progress. * MCL 380.1233 (all staff hold certification)	*Annual Performance Indicators *Analysis of Registry of Educational Personnel Data by MDE
School and plant facilities	*The school identifies, plans and addresses critical elements related to school and plant facilities, and provides data regarding their plan and progress.	*Annual Performance Indicators
School and community relations	*The school identifies, plans and addresses critical elements related to school and community relations, and provides data regarding their plan and progress. *Fully compliant Annual Education Report published	*Annual Performance Indicators *Assurances in the School Improvement Plan
School Improvement Plans and student performance	*The school completes and submits an annual School Improvement Plan, and publishes this plan annually (MCL 380.1204a) *The school tests literacy and math annually in grades 1-5 (MCL 380.1280b) *The school meets or exceeds standards for student achievement, growth in student achievement, improvement in student achievement, achievement gaps, and graduation rate. *The school meets or exceeds standards for attendance rate *The school meets or exceeds standards for participation rate in assessments	*Annual Performance Indicators *Assurances in the School Improvement Plan *Top to Bottom List *Student attendance data *Student enrollment data *Student participation data

COMMENT #26

Accreditation status is based only on top-to-bottom ranking.

RESPONSE TO COMMENT #26

Several factors other than top to bottom ranking enter into an accreditation classification, including each of the factors other than performance on state tests such as attendance rate, whether a school publishes an annual report, whether the school has 100% of teachers with appropriate Michigan certification, whether the school has published a school improvement plan, whether the school has submitted the performance indicators.

COMMENT #27

The system (particularly the top-to-bottom list) needs more transparency; more communication with field is necessary; field needs to understand the system more clearly.

RESPONSE TO COMMENT #27

- *MDE concurs with the need for communication and has devoted significant resources to holding informational sessions, posting information, and sharing with the field*
- *MDE concurs with the need for transparency. However, transparency is not always synonymous with simplicity. The original ranking formula was much simpler than the current one, but district feedback indicated that it did not capture performance appropriately. To adequately capture the complexity of school performance, appropriate statistical modifications were incorporated into the formula. While these modifications introduce complexity into the system, its business rules are public, MDE has openly discussed them, and they can be replicated by qualified individuals.*
- *MDE is planning for comprehensive professional development and communication to accompany the rollout of MI-SAAS if approved by the legislature to further increase transparency of the system.*

COMMENT #28

MI-SAAS as proposed is normative and too competitive; we should return to a criterion-referenced system.

RESPONSE TO COMMENT #28

- *The normative qualities of the system actually protect against a large number of schools becoming unaccredited by limiting those that are unaccredited to the lowest 5% on the top-to-bottom ranking and to those unaccredited for other reasons.*
- *MI-SAAS, as proposed, is robust to changes in the assessment system. A criterion-referenced system is not. Robustness to changes in the assessment system is important at this time because of the change to cut scores in the 2011-12 school year and the upcoming implementation of common core assessments in the 2014-15 school year.*

- *MI-SAAS includes a “sunset clause” that triggers automatic revision of the norm-referenced system when even the lowest performing 5% of schools are adequately preparing students for the next level of education.*

COMMENT #29

Improvement should only be included if it helps a school.

RESPONSE TO COMMENT #29

Including improvement only if it helps the school runs counter to ensuring growth for all students. If a school is generally declining in performance, this will be an “early warning” for it to target its instruction and reverse the slide, as opposed to having the slide go unnoticed.

COMMENT #30

We have insufficient measures of improvement (performance level change and slope).

RESPONSE TO COMMENT #30

MI-SAAS, as proposed, has two measures of improvement: performance level change (in reading and math, grades 4-8, where there is adjacent grade testing) and a four-year improvement slope (for high school, and for writing, science, and social studies in elementary/middle schools).

- *MDE’s performance level change “growth model” transition table is a valid and reliable way to use Michigan’s current assessment data to discuss student growth, given Michigan does not have tests that are vertically scaled, and given general measurement concerns with determining growth on criterion-referenced tests. This method is approved by the U.S. Department of Education and has been reviewed by the MDE Technical Advisory Committee. Given the intense focus on growth in policy discussions at the federal and state levels, it would be unwise and out-of-sync to eliminate measures of growth from the system, particularly since both national and statewide conversations emphasize growth for accountability.*
- *Improvement in the achievement of successive cohorts is the only currently available measure of improvement for the subjects and grades in which there is not adjacent grade testing. A four-year slope has been selected to balance the needs of (1) stability¹ in the measure, and (2) ability to show improvement relatively quickly².*

COMMENT #31

¹ Four years of data is the minimum required to stabilize the measure. Two years of data provide an unreliable measure, three-year slopes algebraically include only the first and third years in the measure, but four years provides a slope that takes into account all four years of data in estimating improvement rates.

² The more years of data there are in the measure, the more difficult it is to demonstrate improvement because of the continuing impact of previous years. Therefore, the minimum number of years required to stabilize the slopes was selected.

The system should be based *only* on growth.

RESPONSE TO COMMENT #31

A system built solely upon growth would perpetuate achievement gaps. If the same growth expectation is held for every student, then students who come into any grade behind their peers will be expected to leave that grade equally behind their peers.

COMMENT #32

One year of improvement can cause a school to be highly ranked, but this year could be unusual.

RESPONSE TO COMMENT #32

- *For the improvement metric, a two-year average of improvement is used, so if a school achieves high growth in one year, it will be averaged with the previous year. Moreover, the MI-SAAS system was specifically designed to give credit for high improvement, so a school with strong improvement in one year would get a benefit for that improvement.*
- *Improvement is only one-fourth of the total ranking, assuring that a “blip” in improvement one year does not have a dramatic effect.*
- *Consideration is being given to a “ceiling clause” so that schools with high performance are rated only on performance and achievement gap, not improvement.*

COMMENT #33

Accountability should primarily be based on student growth, and this can be done within the existing system. ACT is more than adequate, we have evaluation metrics for 8th grade and 10th grade, and then ACT.

RESPONSE TO COMMENT #33

This comment is factually inaccurate. Michigan does not have student growth measures for high school. This is one reason that improvement metrics (the four-year improvement slope) are proposed for all subjects and grades where student-level growth is not available.

Regarding basing accreditation solely on growth, see also the response to comment #31.

COMMENT #34

Two year improvement metric is not sufficient; more than two years of improvement are necessary.

RESPONSE TO COMMENT #34

- *For all subjects (aside from reading and mathematics) in the elementary and middle schools, and in all high school subjects, improvement is determined using a four-year slope, not a two-year change.*
- *The two-year average on student growth in reading and mathematics was selected to strike a balance between stability (using multiple years mutes the effect of an anomalous year) and sensitivity to changes in student performance (the more years are included in the improvement metrics, the longer it takes for real changes a school makes to show up in the data).*

COMMENT #35

Results from assessment and accountability need to be provided in a more timely fashion.

RESPONSE TO COMMENT #35

MDE concurs and has made significant improvements in returning results in a more timely fashion. The accountability results are returned each year before the start of the school year. For the last two years, assessment results are returned (in form of data files) to schools for MEAP within 6 weeks of the end of the testing window, and for MME within 8 weeks of the end of the testing window. While this is near the threshold for rapid return possible for a paper and pencil assessment, MDE continues to strive for efficiencies in this process. With the implementation of Career and College Ready Assessments, expected in 2014, computerized testing will speed up the return of results.

COMMENT #36

The system seems punitive.

RESPONSE TO COMMENT #36

- *The system may seem punitive to some because it is rigorous and holds schools accountable to achieve high levels of student performance; ensure students are growing toward proficiency and that all students are learning, with no students left behind; to graduate students; and to comply with law. This is arguably the portrait of a good school, and MI-SAAS reflects the need for schools to meet targets in all of these critical elements.*

COMMENT #37

It is unfair to hold schools accountable for student performance when each student is different, when some simply don't want to learn, when some do not have adequate parental support, and when students learn at different rates. It is also unfair to hold schools accountable for graduation and attendance rates, as schools do not control those factors.

RESPONSE TO COMMENT #37

MDE does not concur that expecting schools to educate all students and to hold high expectations for all students is unfair. All students can and must learn, and the educational system is responsible for teaching all students, regardless of their backgrounds or other factors external to the school.

COMMENT #38

MDE should wait until the Elementary and Secondary Education Act (ESEA) reauthorization to implement a new accreditation system

RESPONSE TO COMMENT #38

The timeline for ESEA reauthorization has changed repeatedly over the past few years, with no firm timeline currently established. Michigan does not need ESEA or its provisions to determine the state accreditation system, particularly since AYP has been removed, and consideration will be given to the removal of the PLA list from the system. If ESEA reauthorization is such that changes to MI-SAAS are needed, there is a statutory process for making such revisions.

COMMENT #39

MDE should not wait until ESEA reauthorization to implement a new accreditation system

RESPONSE TO COMMENT #39

MDE concurs.

COMMENT #40

This system requires additional data collection efforts and increased workload for staff.

RESPONSE TO COMMENT #40

MI-SAAS requires no data collection beyond that currently in place for EducationYES! or for other federal reporting purposes. Three “yes/no” questions in the current School Improvement Plan (with which compliance is already required under existing Michigan statute) were recently included in the data collection for EducationYES! because they are needed to make EducationYES! compliant with statutory requirements.

COMMENT #41

The system only labels schools that are already labeled by the PLA list.

RESPONSE TO COMMENT #41

This comment is factually incorrect. The PLA list identifies schools within select pools of schools that meet criteria related to Title I, AYP, and other factors, and that have low performance. MI-SAAS will identify more schools than the PLA list does as unaccredited or interim accredited because MI-SAAS 1) includes all schools and excludes none based on Title I status/eligibility or AYP, 2) includes all five tested subjects, and 3) includes the eight additional compliance factors.

That being said, consideration will be given the elimination of not being on the PLA list as a criterion for accreditation.

COMMENT #42

At a bare minimum, 20% will be unaccredited.

RESPONSE TO COMMENT #42

At a bare minimum, 5% of schools will be unaccredited. This number will increase depending on the number of schools that do not meet other standards in the accreditation system. Schools must miss at least one compliance factor two consecutive years (the missed compliance factor does not have to be the same both years) for the compliance factors to affect an accreditation status.

This comment also appears to equate “interim accredited” with “unaccredited.” State statute specifically differentiates between the two classifications.

COMMENT #43

“Michigan is unique among states in our implementation of the No Child Left Behind (NCLB) Act of 2001 through our Workbook (one of the lowest “n” sizes as well as other factors impacting the determination of AYP).”

RESPONSE TO COMMENT #43

Michigan’s n-size is in the “middle of the pack” of potential n-sizes. Some states have smaller n-sizes, some have larger, and some have the same as Michigan.

Additionally, Michigan does not have “unique” AYP procedures. Discussion of AYP is irrelevant since the currently proposed MI-SAAS does not include AYP.

COMMENT #44

MDE is not properly using statistics and does not have the staff to know how to use statistics properly.

RESPONSE TO COMMENT #44

This comment is factually incorrect. MDE staff who work on accreditation and accountability are fully trained in the use of inferential statistics and measurement and are clearly qualified to do this work. Of the staff in MDE who have been a part of the development of MI-SAAS, eight have Ph.D.’s in education

with training in quantitative methods, with six of those eight receiving doctoral degrees specifically in educational statistics and/or psychometrics.

COMMENT #45

MI-SAAS will not be helpful to students in this state.

RESPONSE TO COMMENT #45

MI-SAAS will be helpful to students, parents, and communities in the state by providing them with information about their schools that is based on rigorous and fair standards. Accreditation information can incentivize support for improved achievement and improved outcomes for students.

COMMENT #46

How much of the state reform legislation is incorporated? Why, if the reform legislation is going to be repealed as has been discussed?

RESPONSE TO COMMENT #46

The reform legislation has not been repealed.

COMMENT #47

The proposal appears to be a moving target with the SBE-approved plan.

RESPONSE TO COMMENT #47

Revisions based on feedback and suggestions from the field and national experts have been incorporated to MI-SAAS to improve and refine its components. If feedback and suggestions had not been considered and incorporated, would public comments include complaints about MDE not listening and not being willing to change and improve the system? MDE has an ethical obligation to listen with an open mind to feedback from the field, particularly in high-stakes accountability settings, and has benefitted greatly from the feedback and careful consideration many stakeholders have provided. Listening thoughtfully includes making changes when merited.

COMMENT #48

The statute clearly states that accreditation shall not be based on pupil performance on the MEAP or the MME. How does this proposal meet the requirement when the initial accreditation status is determined solely on the basis of pupil performance on the MME?

RESPONSE TO COMMENT #48

See responses to comments #31 and #26.

COMMENT #49

The MI-SAAS proposal went to the legislature for review in November 2010 and February 2011. Was any response received? If yes, what was it?

RESPONSE TO COMMENT #49

MDE received no response.

COMMENT #50

If implementation is still planned for the 2010-2011 approval year, pending legislative approval, what is the approval process?

RESPONSE TO COMMENT #50

Implementation, upon completing all the required steps in the approval process, was never intended for the 2010-11 school year, which is nearly over. The approval process includes submission of the proposed system to the legislative education committees. If MI-SAAS is approved by the committees and if the injunction against its implementation is lifted, MDE will begin steps for implementation

COMMENT #51

What is the Department's plan to address the 450 non-Title I schools with scores lower than the highest Tier 2 schools that are not included in the calculations? Isn't this discriminatory since Title I eligibility is based on socio-economic status? Does this add confusion to the process, particularly with the general public?

RESPONSE TO COMMENT #51

Consideration will be given to eliminating the tie between appearance on the PLA list and accreditation status. Therefore, this comment may be moot.

COMMENT #52

There has been reference made to a ceiling clause so high performing schools are ranked on proficiency, not improvement. This clause is not specified in the SBE-approved plan. What exactly is that ceiling? How does that align with NCLB?

RESPONSE TO COMMENT #52

The ceiling clause is a business rule idea that has been suggested through public comment from stakeholder groups. Consideration will be given to this idea.

Alignment with NCLB is immaterial since the state accreditation system and NCLB do not need to align.

COMMENT #53

MDE should wait until ESEA is reauthorized since this system will not align with NCLB and the form of the reauthorization is unknown.

RESPONSE TO COMMENT #53

See comment and response to #38

COMMENT #54

Commenter suggests “adjusting the PLA formula to include all schools in the calculation.”

RESPONSE TO COMMENT #54

Consideration will be given to removing the PLA list as part of the accreditation decisions.

COMMENT #55

Commenter suggests “the use of scale scores to determine improvement levels to replace the performance level change methodology currently used by the department.”

RESPONSE TO COMMENT #55

Using scale scores, as suggested by the comment, is invalid. The scale scores from one year cannot be compared to scale scores from the next year, except through performance level change because MEAP and MI-Access assessments are not vertically scaled. MDE utilizes the performance level change metric in order to have a valid and reliable measure of student growth relative to the grade level criterion. This measure was approved by the U.S. Department of Education as a growth model for use in calculating Adequate Yearly Progress. Multiple national measurement experts helped in the design, review, revision and implementation of Performance Level Change.

COMMENT #56

Commenter recommends the removal of the PLA requirement from the MI-SAAS system, due to its “discriminatory” nature.

RESPONSE TO COMMENT #56

See response to comment #54, as well as the response to comment #51.

COMMENT #57

Concerns were expressed that small schools can have their accreditation influenced by one or two students.

RESPONSE TO COMMENT #57

- *MI-SAAS utilizes a “30 full academic year students in each of the previous two years” rule in order to generate a top-to-bottom ranking. Small schools would not meet this bar in many situations. If they did, 30 in the previous two years is a sufficient number for stability of measures.*
- *For the compliance factors, most of them are not reliant on school size.*
- *Participation is one area where a small school might see the failure to test one student making a difference in its compliance. For some schools, regardless of size, one student could put the school over its limit. Small schools may face a challenge to make sure that all their students test, but state and federal statutes require that all students test.*

COMMENT #58

Two concerns were expressed about cuts for accreditation and interim accreditation: (1) these are arbitrary cuts at arbitrary points, and (2) what about schools close to the cuts?

RESPONSE TO COMMENT #58

- *The cuts are not arbitrary, but reflect the “lowest 5%” focus of the federal government and the state reform legislation.*
- *For schools close to the cuts, a school could be only slightly higher than the school below the cut, and both schools may have similar needs for assistance. There is no clear way around that issue. MDE will provide support systems that assist schools with the use of the accountability data to drive instruction and practice.*

COMMENT #59

The system needs to differentiate between schools missing one or two targets, and schools missing many targets.

RESPONSE TO COMMENT #59

The MI-SAAS system differentiates in this way by reporting the score on each of the criteria for each of the standards. The dashboard reporting will also help the schools understand where they met targets and where they did not. Based on experience with the top-to-bottom list, schools have to be low performing on several measures to become unaccredited.

COMMENT #60

What resources will be available to assist unaccredited schools? Interim accredited schools?

RESPONSE TO COMMENT #60

- *All schools can avail themselves of the Statewide System of Support, which includes the following supports: ELA and math content coaches, data coaches, support with Data for Student Success, Principal Fellowship, Leadership Coach, Process mentors, and School Improvement Review visit.*

- *They can access them because they are in the Statewide System of Support or purchase the services through other funding sources.*
- *The dashboard display and the professional development and support around the metrics and data will be available to all schools to help them identify their areas of weakness and strategically develop a plan for improvement.*

COMMENT #61

The inclusion of teacher certification as a compliance factor is problematic for schools, particularly those in remote areas with hard-to-staff or specialized subjects.

RESPONSE TO COMMENT #61

State statute requires that all teachers be appropriately licensed and certificated. For this metric to impact a school's accreditation status, the school must fail to have all teachers licensed for two consecutive years.

COMMENT #62

The Points of Pride collection should be as open-ended and flexible as possible.

RESPONSE TO COMMENT #62

Collection of some information in a standardized format was needed to create some continuity across data elements and to provide schools with a chance to enter their own information and link to their own website. Additionally, if a school elects not to report Points of Pride, it won't display as "N/A" but simply won't appear as an option. This way, schools are not penalized for choosing not to report Points of Pride.

COMMENT #63

MDE should work with NCA, and have them run the accreditation system for the state.

RESPONSE TO COMMENT #63

MDE does collaborate with the North Central Association (NCA) to conduct joint data collection efforts. MDE does not intend to request that NCA run the state's accreditation system because NCA accreditation has a different purpose from the state accreditation system. The purposes of the state accreditation system are delineated in statute.

COMMENT #64

Using z-scores in place of scale scores creates extreme scale scores at the end of the distribution. Small schools, with a couple of really gifted students or students who purposefully put forth no effort could be improperly rewarded or punished.

RESPONSE TO COMMENT #64

This as an appropriate result of using z-scores. It is not only statistically accurate, but intuitively correct that it cannot actually be known how well a student achieves if that student achieves a perfect score. In fact, statistically, the best estimate of such a student's achievement is positively infinite. Analogously, it is not only statistically accurate, but intuitively correct that it cannot be known how poorly a student performs who received a score of zero. In fact, statistically, the best estimate of such a student's achievement is negatively infinite. The top and bottom scale scores are actually truncated to a reasonable value in order assure that the extreme scores are only finitely influential in a school's ranking. Therefore, the top and bottom z-scores for such students are indeed appropriate, and would appropriately affect school rankings.

COMMENT #65

If schools are to be ranked on MEAP results, it must be done one grade at a time and with extreme scale scores adjusted.

RESPONSE TO COMMENT #65

See response to comment #5 regarding grade to grade differences.

See response to comment #64 regarding extreme scale scores.

Doing the analyses one grade at a time would be inappropriate because the individual grade level analyses would be less stable than whole-school analyses. Using z-scores (see response to comment #5) allows for appropriate aggregation across grade levels; therefore, they improve the stability of the resulting measures.

COMMENT #66

Four-, five- and six-year thresholds for graduation rates should be established for MI-SAAS. The computation of percentile ranks and z-scores simply misses the goal.

RESPONSE TO COMMENT #66

The intent of this comment is not entirely clear. This response assumes the intent was that graduation rate should not be incorporated into the top-to-bottom ranking and that thresholds for four-, five-, or six-year graduation rate should be used.

Regarding the inclusion of graduation rate in the top-to-bottom ranking, there are two reasons that it is appropriate to include it in the top-to-bottom ranking. First, it was a consensus recommendation from a referent group. Second, the use of a normative (z-score) approach to inclusion in the top-to-bottom ranking incentivizes every school to improve its graduation rates.

Regarding the use of a four-, five-, or six-year graduation rate, consideration is being given to using the graduation rate for the better of the four-, five-, or six-year graduation rate, once six-year graduation rates are available for all years to calculate the improvement slope. Consideration is being given to use the four-year rate until that time.

COMMENT #67

The ranking should be done entirely with percentile ranks and the use of z-scores should be eliminated. Extreme scale scores should also be adjusted.

RESPONSE TO COMMENT #67

This option was considered and rejected for three reasons. First, while percentile ranks appear to be more intuitively understandable, non-parametric operations (such as identifying medians) would need to be applied to the percentile ranks rather than parametric operations (such as averaging). Second, while this initially appears to be attractive, there are significant issues with weighting in non-parametric operations, while there are no such issues with weighting in parametric operations. Third, weighting occurs throughout the top-to-bottom list in terms of weighting achievement at 50%, improvement at 25%, and achievement gaps at 25% for each subject. It also occurs in terms of weighting graduation rate as 10% of the overall measure in the top-to-bottom list. For those reasons, the top-to-bottom list applies percentile ranks only after all weighting has been performed.

For issues regarding extreme scale scores, see the response to comment #62.

COMMENT #68

Performance level change and slope-based indices are relatively unreliable measures of school effectiveness.

RESPONSE TO COMMENT #68

It is because measures of improvement are less reliable than measures of status that measures of achievement rates (status) are weighted more heavily than are measures of improvement in the top-to-bottom ranking.

COMMENT #69

Mathematics and reading should be weighted more heavily than writing, science, and social studies, since more students take math and reading each year.

RESPONSE TO COMMENT #69

While this comment has merit, this weighting would add further complexity to the system.

COMMENT #70

School cannot reproduce rankings without statewide means and standard deviations.

RESPONSE TO COMMENT #70

MDE plans to provide the z-scores for each student to schools through a secure portal, as well as the statewide means and standard deviations for each grade/subject/test type combination.

COMMENT #71

The statute requires that accreditation standards be established and for the state superintendent to certify whether a school has met those standards. For MDE and schools to address those areas through self-reporting documents is simply not equivalent to establishing and certifying standards. The accreditation system should set school operation standards in all six areas outlined in MCL 380.1280.

RESPONSE TO COMMENT #71

In the statute referenced by this comment, the word “established” actually refers to the standards which MDE is attempting to establish by following the statutory process. MDE is at the public comment and revision stage of establishing the proposed standards. MDE is working to establish the standards right now following the process clearly laid out in legislation.

In MI-SAAS, MDE has taken the six areas of school operation established in statute, and developed a set of standards and criteria listed in statute, as well determined whether or not a school meets or exceeds standards. MI-SAAS includes school data collection (individual level student collection for demographic and program data, school-level data collection, assessment data collection, and all other data collections conducted by the state, as well as the submission of the School Performance Indicators, which include the submission of data); self-study (the School Performance Indicators require that a school engage in self-evaluation and study); and development of a school improvement plan (a specific requirement under MI-SAAS).

With regard to the requirement of “determination of performance data to be used,” much of the discussion that has surrounded MI-SAAS has dealt with this exact topic—which performance data are appropriate and how they are used. In the end, MI-SAAS proposes to use six types of performance data—student achievement, student growth, school-level achievement gaps, graduation rate, attendance rate, and participation rate.

MI-SAAS does set standards in all six areas of school operation outlined in statute, and also identifies the criteria necessary to evaluate a school’s status relative those standards. MI-SAAS does not determine whether or not a school meets these six areas “through self-reporting” only. (As an aside, the current accreditation system, Education YES! brings no additional information into five of the six standards aside from self-reporting.) MI-SAAS determines whether or not a school has met the six areas of school operation for accreditation based on a combination of self-reporting, data analysis of non-assessment data, and student performance data. See chart on page 9 for a detailed description of how the MI-SAAS system addresses the six areas of school operation.

COMMENT #72

Statute requires building-level evaluations that include school data collection, self-study, visitation and validation, determination of performance data to be used, and the development of a school improvement plan. MDE fails to include visitation and validation, which undermines the credibility of the plan.

RESPONSE TO COMMENT #72

MI-SAAS includes visitation and validation in the building-level evaluation. MI-SAAS holds schools accountable for meeting standards using a set of criteria. There are visitation and validation elements embedded in each of the criteria used to address the standards. For example, schools receive visits regarding their School Improvement Plans. MDE and CEPI also conduct monitoring and auditing in the collection of all data, but specifically assessment data (site visits, desk audits, and unannounced walk-throughs) and graduation rate data. Schools are given a chance to review (i.e., validate) all of their data prior to using it in a high-stakes environment, and MDE engages in a series of data quality checks to ensure the information is validated.

MI-SAAS does not, at this time, propose the use of state employees as school “inspectors,” going to each of the 4000 schools in the state to ensure that they are meeting standards in all areas. There are plans to include site visits with a sample of schools according to funding provided to support accreditation in the enactment of MI-SAAS once the system is approved and implemented. The visitation efforts described above meet the requirements of statute as the statute does not require individual visits to every school.